

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,

Plaintiff,

– v. –

GLENN BECK; THE BLAZE, INC.;
MERCURY RADIO ARTS, INC.; AND
PREMIERE RADIO NETWORKS, INC.,

Defendants.

CIVIL ACTION NO.
1:14-cv-11550-PBS

**ASSENTED-TO MOTION TO SEAL PREMIERE’S OPPOSITION
TO PLAINTIFF’S MOTION TO REOPEN CASE AND
COMPEL DEFENDANTS TO COMPLY WITH SETTLEMENT**

Defendant Premiere Networks, Inc. (“Premiere”), with the assent of Plaintiff Abdulrahman Alharbi (“Plaintiff”), respectfully requests leave to file under seal Premiere’s (1) Memorandum of Law in Opposition to Plaintiff’s Motion to Reopen Case and Compel Defendants to Comply With Settlement, (2) Declaration of Michael Grygiel in Support of Opposition to Motion to Reopen Case and Compel Defendants to Comply with Settlement, and (3) Declaration of Scott T. Bick in Opposition to Motion to Reopen Case and Compel Defendants to Comply with Settlement. In support of this assented-to motion, Premiere states as follows:

1. On or about September 12, 2016, the parties entered into a Confidential Settlement Agreement (“Settlement Agreement”) resolving this litigation. The Settlement Agreement requires the parties to keep the terms of the Settlement Agreement strictly confidential.

2. On October 12, 2016, Plaintiff filed a Motion to Seal Pleading Including Confidential Information (“Motion to Seal”). *See* Dkt. No. 171.

3. Also on October 12, 2016, Plaintiff filed under seal a Motion to Reopen Case and Compel Defendants to Comply with Settlement (“Motion to Reopen”).

4. On October 13, 2016, the Court granted Plaintiff’s Motion to Seal.

5. On October 14, 2016, the Court gave electronic notice of a hearing set for October 17, 2016, at 3:30 p.m.

6. In anticipation of that hearing, Premiere intends to file a memorandum of law in opposition to the Motion to Reopen, together with opposing declarations, all of which reference and incorporate the terms of the parties’ Settlement Agreement.

7. In order to comply with its obligations under the Settlement Agreement, Premiere hereby seeks leave to file its papers in opposition to the Motion to Reopen under seal.

8. Counsel for Premiere conferred with Peter J. Haley, counsel to Plaintiff, regarding this motion, and Plaintiff assents to the relief sought herein.

9. Accordingly, good cause exists for filing the materials under seal.

WHEREFORE, Defendants respectfully request leave to file under seal.

Dated: October 17, 2016

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Zachary C. Kleinsasser
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*Attorneys for Defendant Premiere
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LOCAL RULE 7.1 CERTIFICATION

Plaintiff consents to the relief requested as stated above.

/s/ Zachary C. Kleinsasser

CERTIFICATE OF SERVICE

I, Zachary C. Kleinsasser, hereby certify that on October 17, 2016, this document was served upon counsel to Plaintiff in this action.

/s/ Zachary C. Kleinsasser

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